



601 Pennsylvania Ave., NW  
North Building - Suite 800  
Washington, DC 20004  
202-654-5900

November 30, 2017

***VIA ELECTRONIC FILING***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: *Ex Parte Letter***

**WT Docket No. 17-79**, *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*.

Dear Ms. Dortch:

T-Mobile USA, Inc. (“T-Mobile”)<sup>1</sup> respectfully submits this letter to express its support of, and appreciation for, the FCC’s continued focus on actions to facilitate the deployment of new wireless network infrastructure. In particular, the recently released draft Public Notice and draft Program Comment relating to so-called “Twilight Towers” (*i.e.*, towers built between March 16, 2001 and March 7, 2005 that may have been constructed without completing the Section 106 review process under the National Historic Preservation Act) is an excellent step towards finally resolving an issue that has been stifling deployment for far too long.<sup>2</sup> Thousands of towers have been stuck in regulatory limbo for more than a decade, but thankfully the FCC’s proposed action here would create a path to opening these towers for additional wireless deployments.

Allowing qualifying collocations on Twilight Towers without routine Section 106 review will be unlikely to have an adverse effect on any historic properties. The towers in question have been in place for 12-16 years and, as the draft notes, “[i]n the vast majority of cases, no adverse effects from these towers have been brought to the FCC’s attention.”<sup>3</sup> Indeed, the draft Program

---

<sup>1</sup> T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

<sup>2</sup> See *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, *Public Notice*, WT Docket No. 17-79, FCC-CIRC1712-03 (circ. Nov. 22, 2017). See also *Comments of T-Mobile USA, Inc.*, WT Docket No. 17-79, at 63 (filed June 15, 2017) (urging the FCC to “ensure that collocations on twilight towers are excluded from historic preservation review in the same manner as towers constructed prior to March 16, 2001”).

<sup>3</sup> *Draft Program Comment*, at 3.

Comment would simply put collocations on Twilight Towers in the same regulatory category as collocations on older towers that are already exempted from Section 106 review.

Adoption of the Program Comment would also provide significant public benefits. T-Mobile is already deploying the 600 MHz licenses it acquired in the broadcast incentive auction, and collocating on Twilight Towers will likely be an excellent way to expand coverage into new markets using that spectrum. By accessing these Twilight Towers, T-Mobile can potentially accelerate its deployment plans to reach new customers and bring competition to new parts of the country. And as commenters have noted, the FCC's proposal here would promote preservation goals, because "each Twilight Tower that becomes available for collocation could obviate the need for the construction of a new tower."<sup>4</sup>

The FCC's proposal to clear Twilight Towers for collocations is well timed as industry moves to expand mobile broadband coverage and deploy the next generation of wireless technologies. T-Mobile therefore urges the FCC to act quickly upon the conclusion of the Public Notice's comment and reply periods to request that the Advisory Council on Historic Preservation ("ACHP") adopt the Program Comment. Adopting the contemplated relief quickly will ensure that consumers benefit from expanded coverage as soon as possible.

\* \* \*

Pursuant to Section 1.1206(b)(2) of the Commission's rules, this letter is being filed in the above-referenced docket. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Cathleen A. Massey

Cathleen A. Massey

Vice President, Federal Regulatory Affairs

---

<sup>4</sup> Joint Comments of CTIA and the Wireless Infrastructure Association, WT Docket No. 17-79, at 35 (filed June 15, 2017).